

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF HAWAII

In the Matter of

PUBLIC UTILITIES COMMISSION

Instituting a Proceeding to Investigate
Proposed Amendments to the Framework for
Integrated Resource Planning.

DOCKET NO. 2009-0108

PUBLIC UTILITIES
COMMISSION

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**BLUE PLANET FOUNDATION'S INFORMATION REQUESTS TO
HAWAIIAN ELECTRIC COMPANY, INC., MAUI ELECTRIC
COMPANY, LIMITED, AND HAWAII ELECTRIC LIGHT COMPANY**

AND

CERTIFICATE OF SERVICE

SCHLACK ITO LOCKWOOD PIPER & ELKIND
Douglas A. Codiga, Esq.
Topa Financial Center
745 Fort Street, Suite 1500
Honolulu, Hawaii 96813
Tel. (808) 523-6040

Attorney for Blue Planet Foundation

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ELECTRIC COMPANY, INC., MAUI ELECTRIC COMPANY, LIMITED,
AND HAWAII ELECTRIC LIGHT COMPANY**

Blue Planet Foundation ("Blue Planet"), by and through its attorneys Schlack Ito Lockwood Piper & Elkind, hereby submits its Information Requests in the above-captioned matter to the Hawaiian Electric Company, Inc., Maui Electric Company, Limited, and Hawaii Electric Light Company, Inc. ("HECO Companies").

INFORMATION REQUESTS

BP-HECO-IR-1

Ref.: Proposed CESP Framework¹

The Proposed CESP Framework defines "Clean Energy Scenario Planning" as a "mandatory guide for the utilities." Proposed CESP Framework at 1. Please clarify and explain the HECO Companies' intended meaning and use of the term "mandatory guide" in this definition and in the context of the Proposed CESP Framework.

¹ See "A Proposed Framework for Clean Energy Scenario Planning" attached as Exhibit A to the Commission's May 14, 2009 Order Initiating Investigation.

BP-HECO-IR-2

Ref.: Proposed CESP Framework

The Proposed CESP Framework states that the utilities may “at any time” revise or amend a CESP Action Plan and may request a waiver from the Commission from “any or all” of the framework provisions. Proposed CESP Framework at 10. Please describe and explain any and all bases or rationales in support of the foregoing proposal and clarify the HECO Companies’ position with regard to the relationship of the foregoing proposal to encouraging and supporting public participation in the planning process.

BP-HECO-IR-3

Ref.: Preliminary Statement of Position of the HECO Companies filed October 2, 2009 (“HECO PSOP”) at 11.

The HECO PSOP states that the utility’s planning process “must now focus on how best to comply with RPS targets rather than answer the question of ‘how much renewable energy is appropriate.’” HECO PSOP at 11. Please clarify the HECO Companies’ position with regard to whether the framework and planning process under consideration in this proceeding should consider and promote the acquisition of clean energy resources in amounts and/or at a rate that exceed that required to achieve compliance with the requirements of Part V of Chapter 269, Hawaii Revised Statutes, as amended (Hawaii RPS law).

BP-HECO-IR-4

Ref.: HECO PSOP at 15.

Please identify and describe the alleged “new tools and planning capabilities” the HECO Companies state will be needed to “inform the utility on how to plan and manage the evolving grid.” HECO PSOP at 11. Please clarify the HECO Companies’ position as to whether the framework and planning process under consideration in this proceeding should consider and

promote changes to existing bulk power reliability standards to enable the grid to accommodate additional intermittent renewable energy resources.

BP-HECO-IR-5

Ref.: HECO PSOP at 17.

The HECO PSOP states that planning assumptions will include “desired levels of reliability [and] operational requirements and constraints[.]” HECO PSOP at 17. Please explain what is meant by this statement and clarify the HECO Companies’ position with regard to whether the framework and planning process under consideration in this proceeding should address alleged technical limits to the adoption of renewable energy.

BP-HECO-IR-6

Ref: HECO PSOP at 21.

The HECO PSOP states the HECO Companies’ concerns regarding an independent third party, and not the utility, conducting the planning process. HECO PSOP at 21. Please clarify the HECO Companies’ position with regard to the use of an independent observer to monitor and oversee (rather than conduct) the planning process as conducted by the HECO Companies and stakeholders.

BP-HECO-IR-7

Ref: HECO PSOP at 27.

Please clarify whether use of Locational Value Maps (“LVM”) in the planning process will (i) require the HECO Companies to incorporate distribution system planning into the planning process, or (ii) cause the HECO Companies to develop, in the planning process, proposed modifications to the design or operation of the distribution system, which

modifications are intended to enable distribution circuit penetration of intermittent renewable distributed generation in excess of current distribution circuit penetration limits.

DATED: Honolulu, Hawaii, November 10, 2009.



DOUGLAS A. CODIGA
Attorney for Blue Planet Foundation

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date a copy of the foregoing document was
duly served upon the following individuals by placing a copy of same in the United States Mail,
postage prepaid, and/or by electronic service, as follows:

CATHERINE P. AWAKUNI
EXECUTIVE DIRECTOR
DIVISION OF CONSUMER ADVOCACY
335 Merchant Street, Room 326
Honolulu, Hawaii 96813

2 Copies by U.S. Mail and
Electronic Service

DARCY L. ENDO-OMOTO, VICE PRESIDENT
GOVERNMENT AND COMMUNITY AFFAIRS
HAWAIIAN ELECTRIC COMPANY, INC.
P.O. Box 2750
Honolulu, Hawaii 96840

1 Copy by U.S. Mail and
Electronic Service

DEAN K. MATSUURA
MANAGER, REGULATOR AFFIARS
HAWAIIAN ELECTRIC COMPANY, INC.
HAWAII ELECTRIC LIGHT COMPANY, INC.
MAUI ELECTRIC COMPANY, LTD.
P.O. Box 2750
Honolulu, Hawaii 96840

1 Copy by U.S. Mail and
Electronic Service

JAY IGNACIO, PRESIDENT
HAWAII ELECTRIC LIGHT COMPANY, INC.
P.O. Box 1027
Hilo, Hawaii 96721

1 Copy by U.S. Mail and
Electronic Service

THOMAS W. WILLIAMS, JR., ESQ.
PETER Y. KIKUTA, ESQ.
DAMON SCHMIDT, ESQ.
GOODSILL ANDERSON QUINN STIFEL LLC
1099 Alakea Street, Suite 1800
Honolulu, Hawaii 96813

Electronic Service

Counsel for Hawaiian Electric Company, Inc.
Hawaii Electric Light Company, Inc.
Maui Electric Company, Ltd.

RANDALL J. HEE, P.E.
TIMOTHY BLUME
PRESIDENT AND CEO
KAUAI ISLAND UTILITY COOPERATIVE
4463 Pahe'e Street, Suite 1
Lihue, Hawaii 96766-2000

Electronic Service

JEFFREY M. KISSEL
PRESIDENT AND
CHIEF EXECUTIVE OFFICER
THE GAS COMPANY, LLC
745 Fort Street, 18th Floor
Honolulu, Hawaii 96813

Electronic Service

GEORGE T. AOKI, ESQ.
THE GAS COMPANY, LLC
745 Fort Street, 18th Floor
Honolulu, Hawaii 96813

Electronic Service

KENT T. MORIHARA, ESQ.
KRIS N. NAKAGAWA, ESQ.
DANA L. VIOLA, ESQ.
SANDRA L. WILHIDE, ESQ.
MORIHARA LAU & FONG LLP
841 Bishop Street, Suite 400
Honolulu, Hawaii 96813

Electronic Service

Counsel for Kauai Island Utility Cooperative

THEODORE A. PECK
STATE OF HAWAII
HAWAII STATE ENERGY OFFICE
DEPARTMENT OF BUSINESS, ECONOMIC
DEVELOPMENT AND TOURISM
235 S. Beretania Street, Room 501
Honolulu, Hawaii 96813

Electronic Service

ESTRELLA A. SEESE
STATE OF HAWAII
HAWAII STATE ENERGY OFFICE
DEPARTMENT OF BUSINESS, ECONOMIC
DEVELOPMENT AND TOURISM
235 S. Beretania Street, Room 501
Honolulu, Hawaii 96813

Electronic Service

MARK J. BENNETT, ESQ.
DEBORAH DAY EMERSON, ESQ.
GREGG J. KINKLEY, ESQ.
STATE OF HAWAII
DEPARTMENT OF THE
ATTORNEY GENERAL
425 Queen Street
Honolulu, Hawaii 96813

Electronic Service

Counsel for the Department of Business,
Economic Development and Tourism

ALFRED B. CASTILLO, JR., ESQ.
AMY I. ESAKI, ESQ.
MONA W. CLARK, ESQ.
COUNTY OF KAUAI
OFFICE OF THE COUNTY ATTORNEY
4444 Rice Street, Suite 220
Lihue, Hawaii 96766

Electronic Service

Counsel for the County of Kauai

GLEN SATO
COUNTY OF KAUAI
OFFICE OF ECONOMIC DEVELOPMENT
4444 Rice Street, Suite 200
Lihue, Kauai 96766-1300

Electronic Service

BRIAN T. MOTO, ESQ.
MICHAEL J. HOPPER, ESQ.
COUNTY OF MAUI
DEPARTMENT OF THE
CORPORATION COUNSEL
200 South High Street
Wailuku, Hawaii 96793

Electronic Service

Counsel for the County of Maui

LINCOLN S.T. ASHIDA, ESQ.
WILLIAM V. BRILHANTE, JR., ESQ.
MICHAEL J. UDOVIC, ESQ.
COUNTY OF HAWAII
OFFICE OF THE CORPORATION COUNSEL
101 Aupuni Street, Suite 325
Hilo, Hawaii, 96720

Electronic Service

Counsel for the County of Hawaii

MR. HENRY Q. CURTIS
VICE PRESIDENT FOR CONSUMER ISSUES
LIFE OF THE LAND
76 North King Street, Suite 203
Honolulu, Hawaii 96817

Electronic Service

CARL FREEDMAN
HAIKU DESIGN & ANALYSIS
4234 Hana Highway
Haiku, Hawaii 96708

Electronic Service

WARREN S. BOLLMEIER, II
PRESIDENT
HAWAII RENEWABLE ENERGY ALLIANCE
46-040 Konane Place 3816
Kaneohe, Hawaii 96744

Electronic Service

MARK DUDA, PRESIDENT
HAWAII SOLAR ENERGY ASSOCIATION
P. O. Box 37070
Honolulu, Hawaii 96837

Electronic Service

ISAAC H. MORIWAKE, ESQ.
DAVID L. HENKIN, ESQ.

Electronic Service

EARTHJUSTICE

223 South King Street, Suite 400

Honolulu, Hawaii 96813

MR. TYRONE CROCKWELL

Electronic Service

AREA DIRECTOR OF ENGINEERING

JW MARRIOTT IHI LANI RESORT & SPA

92-1001 Olani Street

Ko Olina, Hawaii 96707

THOMAS C. GORAK, ESQ.

Electronic Service

GORAK & BAY, LLC

1161 Ikena Circle

Honolulu, Hawaii 96821

Counsel for JW Marriott Ihilani Resort & Spa,
Waikoloa Marriott Beach Resort & Spa,
Maui Ocean Club, Wailea Marriott, and Marriott
Hotel Services, Inc., on behalf of Kauai Marriott
Resort & Beach Club

DEAN T. YAMAMOTO, ESQ.

Electronic Service

SCOTT W. SETTLE, ESQ.

JODY SHIN YAMAMOTO, ESQ.

DUKE T. OISHI, ESQ.

YAMAMOTO & SETTLE

700 Bishop Street, Suite 200

Honolulu, Hawaii 96813

Counsel for Forest City Hawaii Residential, Inc.

DATED: Honolulu, Hawaii, November 10, 2009.



DOUGLAS A. CODIGA
Attorney for Blue Planet Foundation